

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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July 6, 2023

**BY ECF**

Honorable Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Jesus Rios Quintero  
19 Cr. 307 (SHS)**

Dear Judge Stein:

I represent defendant Jesus Rios Quintero in the above-captioned case. I write to request a bail modification to permit Mr. Rios to travel to Pennsylvania to visit his sister between July 23 and July 24, 2023. Mr. Rios has pled guilty and is currently awaiting sentencing. He was released on bail in November 2021, and has been residing in the community since that time without any bail violations or other issues. He is currently employed and lives with his partner and child.

I have conferred with Pretrial Services Officer Ashley Cosme, who informs me that Pretrial objects to this request because "Pretrial objects to all overnight travel for individuals on home confinement." I have also conferred with AUSA Ryan Finkel on behalf of the government, who has no objection to this travel. Thank you for consideration of this request.

Respectfully submitted,  
/s/ Sarah Baumgartel  
Sarah Baumgartel  
Assistant Federal Defender  
Tel.: (212) 417-8772

cc: AUSA Ryan Finkel (by ECF)

7/6/2023  
Applying to appear  
So [unclear]  
JLW  
BS.D.S.